

FILED
RICHARD W. NAGEL
CLERK OF COURT
IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION
2016 FEB 25 PM 2:00
THOMAS M. ROSE
3:16 cr-026

UNITED STATES OF AMERICA

v.

ROBERT STEVEN JONES

CASE NO. 3:16-cr-

INDICTMENT

18 U.S.C. § 2251(a) & (e)
18 U.S.C. § 2252(a)(2) & (b)(1)
18 U.S.C. § 2252(a)(4)(B) & (b)(2)
18 U.S.C. § 2422(b)
18 U.S.C. § 2260A

FORFEITURE

THE GRAND JURY CHARGES THAT:

COUNT 1
[18 U.S.C. § 2422(b)]

1. From at on or about July 29, 2015 until on or about November 4, 2015, in the Southern District of Ohio, defendant **ROBERT STEVEN JONES** using any facility and means of interstate and foreign commerce, knowingly persuaded, induced, enticed, and coerced an individual who had not attained the age of 18 years (whose identity is known to the Grand Jury and is referred herein as "Minor Female A"), to engage in any sexual activity for which any person can be charged with a criminal offense.

All in violation of 18 U.S.C. § 2422(b).

COUNT 2
[18 U.S.C. § 2251(a) & (e)]

2. On or about August 2, 2015, in the Southern District of Ohio, defendant **ROBERT STEVEN JONES** knowingly employed, used, persuaded, induced, enticed, and coerced a minor, namely, Minor Female A, to engage in any sexually explicit conduct for the purpose of producing any visual depictions of such conduct (1) knowing and having reason to know that such visual depictions would be transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, (2) such visual depictions were produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including computer, and (3) such visual depictions were actually transported and transmitted (a) using any means and facility of interstate and foreign commerce and (b) in and affecting interstate and foreign commerce.

All in violation of 18 U.S.C. § 2251(a) & (e).

COUNT 3
[18 U.S.C. § 2251(a) & (e)]

3. On or about October 13, 2015, in the Southern District of Ohio, defendant **ROBERT STEVEN JONES** knowingly employed, used, persuaded, induced, enticed, and coerced a minor, namely, Minor Female A, to engage in any sexually explicit conduct for the purpose of producing any visual depictions of such conduct (1) knowing and having reason to know that such visual depictions would be transported and transmitted using any means and facility of interstate and

foreign commerce and in and affecting interstate and foreign commerce, (2) such visual depictions were produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including computer, and (3) such visual depictions were actually transported and transmitted (a) using any means and facility of interstate and foreign commerce and (b) in and affecting interstate and foreign commerce.

All in violation of 18 U.S.C. § 2251(a) & (e).

COUNT 4
[18 U.S.C. § 2422(b)]

4. From on or about August 5, 2015 until on or about October 18, 2015, in the Southern District of Ohio, defendant **ROBERT STEVEN JONES** using any facility and means of interstate and foreign commerce, knowingly persuaded, induced, enticed, and coerced an individual who had not attained the age of 18 years (whose identity is known to the Grand Jury and is referred herein as “Minor Female B”), to engage in any sexual activity for which any person can be charged with a criminal offense.

All in violation of 18 U.S.C. § 2422(b).

COUNT 5
[18 U.S.C. § 2251(a) & (e)]

5. On or about August 30, 2015, in the Southern District of Ohio, defendant **ROBERT STEVEN JONES** knowingly employed, used, persuaded, induced, enticed, and coerced a minor, namely, Minor Victim B, to engage in any sexually explicit conduct for the purpose of producing any visual depictions of such conduct (1) knowing and having reason to know that such visual depictions would be transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, (2) such visual depictions were produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including computer, and (3) such visual depictions were actually transported and transmitted (a) using any means and facility of interstate and foreign commerce and (b) in and affecting interstate and foreign commerce.

All in violation of 18 U.S.C. § 2251(a) & (e).

COUNT 6
[18 U.S.C. § 2252(a)(2) & (b)(1)]

6. On or about August 12, 2015, in the Southern District of Ohio, defendant **ROBERT STEVEN JONES** knowingly received any visual depiction using any means and facility of interstate and foreign commerce, and which visual depictions had been shipped and transported in and affecting interstate and foreign commerce, and which contained materials which have been mailed and shipped and transported in and affecting interstate and foreign commerce, by any means

including by computer, and the production of such visual depictions involved the use of a minor engaging in sexually explicit conduct and the visual depictions are of such conduct.

All in violation of 18 U.S.C. § 2252(a)(2) & (b)(1).

COUNT 7
[18 U.S.C. § 2251(a) & (e)]

7. On or about October 14, 2015, in the Southern District of Ohio, defendant **ROBERT STEVEN JONES** knowingly attempted to employ, use, persuade, induce, entice, and coerce a minor (whose identity is known to the Grand Jury and is referred to herein as "Minor Female C") to engage in any sexually explicit conduct for the purpose of producing any visual depictions of such conduct (1) knowing and having reason to know that such visual depictions will be transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, and (2) such visual depictions would be produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including computer.

All in violation of 18 U.S.C. § 2251(a) & (e).

COUNT 8
[18 U.S.C. § 2251(a) & (e)]

8. Beginning on or about October 8, 2015 and continuing until on or about October 9, 2015, in the Southern District of Ohio, defendant **ROBERT STEVEN JONES** knowingly attempted to employ, use, persuade, induce, entice, and coerce a minor (whose identity is known to the Grand Jury and is referred to herein as “Minor Female D”) to engage in any sexually explicit conduct for the purpose of producing any visual depictions of such conduct (1) knowing and having reason to know that such visual depictions will be transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, and (2) such visual depictions would be produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including computer.

All in violation of 18 U.S.C. § 2251(a) & (e).

COUNT 9

[18 U.S.C. § 2251(a) & (e)]

9. Beginning on or about October 12, 2015 and continuing until on or about October 18, 2015, in the Southern District of Ohio, defendant **ROBERT STEVEN JONES** knowingly employed, used, persuaded, induced, enticed, and coerced a minor (whose identity is known to the Grand Jury and is referred herein as "Minor Female E"), to engage in any sexually explicit conduct for the purpose of producing any visual depictions of such conduct (1) knowing and having reason to know that such visual depictions would be transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, (2) which such visual depictions were produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including computer, and (3) which such visual depictions were actually transported and transmitted (a) using any means and facility of interstate and foreign commerce and (b) in and affecting interstate and foreign commerce.

All in violation of 18 U.S.C. § 2251(a) & (e).

COUNT 10
[18 U.S.C. § 2252(a)(4)(B) & (b)(2)]

10. On or about August 21, 2015, defendant **ROBERT STEVEN JONES**, in the Southern District of Ohio, knowingly possessed one or matters which contain visual depictions that have been shipped and transported using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, and which visual depictions were produced using materials which have been shipped and transported in and affecting interstate and foreign commerce, by any means including by computer. The production of such visual depictions involved the use of one or more minors, including prepubescent minors and minors who had not attained 12 years of age, engaging in sexually explicit conduct, and the visual depictions are of such conduct.

All in violation of 18 U.S.C. § 2252(a)(4)(B) & (b)(2).

COUNT 11
[18 U.S.C. § 2260A]

11. Beginning on an exact date unknown, but by at least July 29, 2015 through on or about November 4, 2015, defendant **ROBERT STEVEN JONES**, being required by Federal or other law to register as a sex offender, committed a felony offense involving a minor; namely the felony offenses charged in Counts One, Two, Three, Four, Five, Seven, Eight and Nine of this Indictment.

All in violation of 18 U.S.C. § 2260A.

FORFEITURE ALLEGATIONS

12. Upon conviction of any offense alleged in Count One and/or Four of this Indictment, the defendant **ROBERT STEVEN JONES**, shall forfeit to the United States pursuant to 18 U.S.C. § 2428(a): (1) any property, real or personal, that was used or intended to be used to commit or to facilitate the commission of such violation; and (2) any property, real or personal, constituting or derived from any proceeds that the defendant obtained, directly or indirectly, as a result of such violation, including but not limited to the following:

- a. ZTE cellular telephone, Serial No. 320930103305;
- b. All-In-One HP computer, Serial No. 4CS0410CNX 9;
- c. Apple iPhone, IMEI 358372062039301, and silver case;
- d. SanDisk Cruzer Glide 32 GB thumb drive
- e. Apple iPhone, IMEI 013888008166962;
- f. Apple iPhone, IMEI 359307064821487;
- g. x-Box, Serial No. 141738440348;
- h. Dell Inspiron laptop, Service Tag NO. 1R24C12 and power cord.

13. Upon conviction of any offense alleged in Count Two, Three, Five, Six, Seven, Eight, Nine, Ten and/or Eleven of this Indictment, the defendant **ROBERT STEVEN JONES** shall forfeit to the United States pursuant to 18 U.S.C. § 2253(a): (1) any visual depiction described in Section 2251, 2251A, 2252, 2252A, 2252B, or 2260 of Chapter 110 of Title 18 United States Code, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of Chapter 110 of Title 18 of the United States Code; (2) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from

such offense; and (3) any property, real or personal, used or intended to be used to commit or to promote the commission of such offense and any property traceable to such property, including but not limited to, the following:

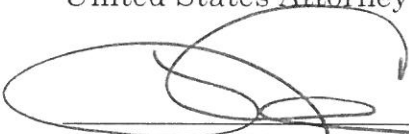
- a. ZTE cellular telephone, Serial No. 320930103305;
- b. All-In-One HP computer, Serial No. 4CS0410CNX 9;
- c. Apple iPhone, IMEI 358372062039301, and silver case;
- d. SanDisk Cruzer Glide 32 GB thumb drive
- e. Apple iPhone, IMEI 013888008166962;
- f. Apple iPhone, IMEI 359307064821487;
- g. x-Box, Serial No. 141738440348;
- h. Dell Inspiron laptop, Service Tag NO. 1R24C12 and power cord.

A TRUE BILL

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FOREMAN

CARTER M. STEWART
United States Attorney



LAURA I. CLEMMENS
Chief, Dayton Branch